

DAN M. WINDER, ESQ.  
Nevada State Bar No. 1569  
LAW OFFICE OF DAN M. WINDER, P.C.  
3507 W. Charleston Blvd.  
Las Vegas, NV 89102  
Telephone: (702) 474-0523  
Facsimile: (702) 474-0631  
winderdanatty@aol.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHARLENE BYNUM individually, as the  
wife of RONALD BYNUM and as the  
Guardian of the Person and Estate of  
RONALD BYNUM,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS; JACOB  
RAY (P#1886); RODRIGO DELARA  
(P#2417); JOHN E TONRY (P#1684); et al

Defendants.

Case No: 2:17-CV-02102-APG-VCF

Consolidated With

Case No. 2:18-CV-00354-MMD-CWF

**STIPULATION AND ORDER  
TO  
EXTEND TIME FOR RESPONSE  
TO  
DISPOSITIVE MOTIONS**

**FIRST REQUEST**

Pursuant to LR 6-1 and 26-4, the parties, by and through their respective counsel of record hereby stipulate and request this court extend the deadline to file responses to DEFENDANTS' Motions for Summary Judgment by 30 days to and including the 30<sup>th</sup> of October, 2019.

DEFENDANTS NLV AND CCS have, on behalf of themselves and their respective employees, each filed Motions for Summary Judgment in this matter. The Las Vegas defendants have joined in both motions. Collectively, the Motions total 67 pages, exclusive of exhibits. The appended exhibits collectively total more than 140 pages. There are more than 60 defendants; more than 30 depositions and thousands of pages of record. There are approximately 72 hours of video.

Both DEFENDANTS NLV AND CCS requested and, with stipulation, were granted more

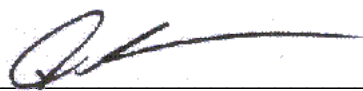
than 30 days past the dispositive motion deadline to file their Motions.

In addition, Plaintiff's main paralegal assigned to this case has been hospitalized or absent from work due to illness for much of the time allotted for the response.

Dated this 24 <sup>th</sup> day of SEPTEMBER, 2019.	Dated the 24 <sup>th</sup> day of September, 2019
LAW OFFICE OF DAN M. WINDER, P.C. <u>/s/Dan M. Winder</u> DAN M. WINDER, ESQ. Nevada State Bar No. 1569 3507 W. Charleston Blvd. Las Vegas, NV 89102 Telephone: (702) 474-0523 Facsimile: (702) 474-0631 <a href="mailto:winderdanatty@aol.com">winderdanatty@aol.com</a> <i>Attorneys for Plaintiff</i>	<u>/s/Robert W. Freeman, Jr</u> Robert W. Freeman, Jr., Esq. Nevada Bar No. 3062 6385 S. Rainbow Blvd., Suite 600 Las Vegas, Nevada 89118 Attorneys for Defendants NLV and its employees
Dated this 24 <sup>th</sup> day of September, 2019.	Dated this 24 <sup>th</sup> day of September, 2019
<u>/s/Brent Vogel</u> S. Brent Vogel, Esq. John M. Orr, Esq. LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 South Rainbow Boulevard, #600 Las Vegas, NV 89118 Attorneys for Defendants CORRECT CARE SOLUTIONS & ITS EMPLOYEES	<u>/s/John A. Curtas</u> John A. Curtas Deputy City Attorney NV Bar No. 1841 495 South Main Street, sixth Floor Las Vegas, NV 89101 Attorneys for City of Las Vegas Defendants

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
Dated: September 25, 2019.